

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

NOV 17 1982

CERTIFIED MAIL RETURN RECEIPT REQUESTED

In Reply Refer To: 3AW22

Mr. R. E. Northup Environmental Affairs Director Appalachian Power Company P.O. Box 2021 Roanoke, Virginia 24022

Re: Notice of Violation No. III-83-7-VR
John E. Amos Plant, Morgans Landing, WV
EPA I.D. No. WVD 98 055 4646
Mountaineer Plant, New Haven, WV
EPA I.D. No. WVD 98 055 4463
Philip Sporn Plant, New Haven, WV
EPA I.D. No. WVD 98 055 4703

Dear Mr. Northup:

Effective November 19, 1981, the owner or operator of a surface impoundment, landfill or land treatment facility which is used to manage hazardous waste is required by the Environmental Protection Agency (EPA) to implement a groundwater monitoring program in accordance with regulation 40 C.F.R. § 265.90. The sampling and analysis provisions of regulation 40 C.F.R. § 265.92 require quarterly monitoring of all listed parameters for the first year of the program.

The owner or operator of facilities required to conduct a groundwater monitoring program must report to EPA quarterly the results of certain of the analyses in accordance with regulation 40 C.F.R. § 265.94. On February 23, 1982, EPA published a notice in the Federal Register delaying the date for submission of the first two quarterly reports from March 6, 1982 and June 3, 1982 to August 1, 1982. This delay did not, though, affect the requirement to report any parameters which exceed the maximum contaminant levels listed in the EPA Interim Primary Drinking Water Standards.

The Part A Permit Application for the above facilities indicates that one of the processes employed in their management of hazardous waste is a surface impoundment, landfill or land treatment facility. Therefore, the requirement to conduct groundwater monitoring and submit quarterly reports applies to these facilities. As of the date of this Notice, EPA has not received either of the quarterly reports for the above facilities.

Appalachian Power Company is, then, in violation of regulation 40 C.F.R. § 265.94 and the Resource Conservation and Recovery Act (the Act).

Appalachian Power Company must achieve compliance with the groundwater monitoring regulations as quickly as possible. If compliance is not achieved within 10 days of receipt of this notice, EPA may take administrative or civil action against Appalachian Power Company to require compliance. The Act authorizes penalties of up to \$25,000 per day for each violation.

If you have any questions concerning this Notice, please contact Ralph Siskind, an attorney in the Office of Regional Counsel at the above address or at (215) 597-8542.

Sincerely yours,

Peter N. Bibko

Regional Administrator



#EG 51.11

ERHADELPHIA PENERHUSALAN AND ANNO 1990.

June 16, 1982

Mr. John W. Vaughan Appalachian Power Co.-Philip Sporn Plant P.O. Box 2021 Roanoke, VA 24022

Re: EPA I.D. No. WVD 98 055 4703

Dear Mr. Vaughan:

This is to acknowledge receipt of your letter dated <u>May 19, 1982</u> in which you request a change to "Conditions of Operations During Interim Status."

Enclosed is an amended form reflecting the changes(s). If we can be of any further assistance, please do not hesitate to contact Ms. Joan Henry, a member of my staff, on 215-597-8751.

Sincerely yours,

Patrick Anderson

Chief, RCRA Permit and Pesticides Section

Air and Waste Management Division

cc: Mr. R. E. Northrup

INTERIM STATUS AMENDED

Date Prepared: June 16, 1982

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Appalachian Power Company-Philip Sporn Plant

Location:

US Rt. 33

New Haven, WV 25265

EPA I.D. No.: WVD 98 055 4703

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name:

Appalachian Power Company-Philip Sporn Plant Mr. John W. Vaughan, President APCO

Mr. C. A. Heller, President OPCO

Operator's Name:

III. During the period of interia status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS	DESIGN CAPACITY
S01	165 Gals.
S 0 2	50.000 Gals.
T02	71,500 Gals/Day
T04	144,000 Gals/Day

IV. During the period of interim status, the facility may handle only th hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

F00·1 D007 D001



REGION III

JUN 1 1982

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

WVD 98 055 4703

Mr. John W. Vaughan Appalachian Power Co. - P. Sporn Plant P. O. Box 2021 Roanoke, VA 24022

Dear Mr. Vaughan:

This letter is to make you aware of two recent amendments to the RCRA regulations. On April 7, 1982, the Environmental Protection Agency (EPA) published requirements for owners and operators of hazardous waste management facilities to demonstrate financial responsibility for the costs of closure and post-closure care. EPA published third party liability coverage requirements for owners or operators of hazardous waste management facilities on April 16, 1982.

Closure and Post-Closure Assurance

As an owner or operator of a hazardous waste treatment, storage, or disposal facility, you are required to submit information that demonstrates that you are financially capable of bearing the costs of closing your facility. In addition, if you own or operate a <u>disposal</u> facility, you also must submit information that demonstrates that you are capable of covering the costs of post-closure care of your facility.

The appropriate documentation, as specified in the enclosed regulations, must be submitted to this EPA Regional Office by July 6, 1982. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- a trust agreement;
- ° a surety bond;
- a letter of credit, including a trust agreement;
- a certificate of insurance;
- a letter from your firm's chief financial officer; and a special report and a report of examination from an independent certified public accountant; or
- a corporate guarantee.

Liability Insurance

As an owner or operator of a hazardous waste treatment, storage, or disposal facility, you must demonstrate that you have liability insurance for <u>sudden</u> accidental occurrences at your facility. In addition, if you own or operate a landfill, surface impoundment, or land treatment facility, you must also demonstrate that you have liability insurance for <u>nonsudden</u> accidental occurrences at your facility.

You may use either an insurance policy or a financial test to You must submit to demonstrate third party liability coverage. this office by July 15, 1982, the appropriate documentation for liability coverage for sudden accidents, as specified in the enclosed regulations. You must submit the appropriate documentation for liability coverage for nonsudden accidents, as specified in the enclosed regulations, according to the following phase-in schedule: by January 16, 1983, if you have annual sales or revenues of \$10 million or more; by January 16, 1984, if you have sales or revenues between \$5 and \$10 million; or by January 16, 1985 if your annual sales or revenues are less than If you fall into one of the last two groups, you must submit notification of when you will have liability coverage for nonsudden accidents by January 16, 1983. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- a certificate of insurance;
- a liability endorsement; or
- a letter from your firm's chief financial officer, and a special report and a report of examination from an independent certified public accountant.

The financial documents must be sent to:

Ms. Shirley Bulkin (3AW32)
U. S. Environmental Protection Agency
Region III, Curtis Building
Sixth and Walnut Streets
Philadelphia, PA 19106

Please be sure to include your EPA Identification Number on all correspondence.

Only generators who store hazardous waste on site in tanks or containers for less than 90 days are exempt from these requirements. Also, State and Federal facilities are exempt from these requirements. Your State, however, may have additional requirements in these areas.

Please review the enclosed copies of the revised interim final regulations and minor corrections. Failure to comply with these requirements subjects you to possible enforcement action. If you have any questions or need assistance, please feel free to contact Mr. William Schremp of the State Waste Management Section at (215) 597-0982.

Sincerely yours,

Stephen R. Wassersug Director Air and Waste Management Division

Enclosures

RECORD OF COMMUNICATION	☐ PHONE CALL ☐ DISCUSSION ☐ OTHER (SPECIFY)	FIELD TRIP CONFE
	(Record of iter	n checked above)
TO: APPALACHIAN POWER CO. R.E. NORTHRUP	FROM: PAUL GOTTHOLD A.T. KEARNEY, INC	DATE JUNE 4, 1982
DAN GRAY	EPA REGION III	10:15 AM
SUBJECT		
APPALACHIAN POWER CO LUTTER O	OF MAY 19, 1982	
SUMMARY OF COMMUNICATION		
I SPOKE WITH DICK NORTHICU	p & DAN GRAY OF APPALACE	HAN POWER CO
REGARDING THEIR MAY 19,1982	LETTER ASKING FOR REVISI	ON TO THE SURFACE
IMPOUNDMENT (5) INDICATED ON 7	HE PARTA APPLICATIONS OF:	
(1) JOHN E AMOS PLNT		
(2) MOUNTAINEER PUNT		·
(3) PHILIP SPORN PLAT		

MR. GRAY EXPLAINED THAT THE OPIGNAL LISTING OF TOZ, D83, \$ 504 WAS A CONTINGENCY LISTING SUBMITTED TO INSURE INTERLIM STATUS FOR THE IMPOUNDMENTS IN THE EVENT THE IMPOUNDMENTS ACTUALLY WERE HAZARDOUS WASTE FACILITIES. SINCE NOV 19,1980 - EXTRUSIVE TESTING HAS SHOWN THAT THE BOILER CLEANING WASTES INVOLVED ARE NOT HAZAKDOUS. THEREFORE, THE MAY 19, 1982 LETTER WAS SUBMITTED TO DELETE THE LISTING OF D83 & SO4 FROM THE THREE REFERENCED PART A APPLICATIONS. THE FACILITIES WISH TO RETAIN DRUM & TANK STORAGE (WHICH REPREMENTS RECYCLE OF WASTE CIL & SOLVENTS TO THE BOLLERS) AND TREATMENT IMPOUNDMENT (TOZ).

CONCLUSIONS. ACTION TAKEN OR REQUIRED

THE TREATMENT IMPOUNDMENT IS TO REMAIN AS PART OF THE INTERIM STATUS ACTIVITY IN CASE A BATCH OF BOILER CLEANING WASTE IS FOUND TO BE HAZARDOUS (SINCE NOV, 1980 - NO BOILER CLEANING WASTE HAS BEEN FOUND HAZAKDOUS BY TESTING.) IN ADDITION MR. GRAY INDICATED THAT IF AND WHEN EPA ADOPTS THE PROPOSED RULE FOR USING CHROMIUM+6 FOR THE EP TOXIC CONSTITUENT, THEY WOULD WITHDRAW THEIR PAINT

INFORMATION COPIES

TO:

Telephone: area code (703) 985-2300

May 19, 1982

CERTIFIED LETTER

Shirley D. Bulkin, Chief RCRA Administrative Support Section Permit Enforcement Branch U.S. EPA, Region III 6th and Walnut Streets Philadelphia, Pennsylvania 19106

Dear Chief Bulkin:

By copy of this letter and attachments, Appalachian Power Company hereby makes revisions to the Hazardous Waste Permit applications for the following power plants: 1) John E. Amos Plant, Morgans Landing, W. Va.; 2) Mountaineer Plant, New Haven, W. Va.; and 3) Philip Sporn Plant, New Haven, W. Va. The original applications were filed on November 17, 1980.

Copies of the amended sheets and the original sheets (marked void) are attached. These changes are being made since no hazardous wastes will be stored or disposed of in surface impoundments at these plants. Also, the amended sheets reflect the new I.D. number assigned each facility.

We appreciate your attention in this matter. If you have questions, please contact me at (703) 985-2429.

Sincerely,

R. E. Northup

Environmental Affairs Director

REN/dlw

Attachments



January 25, 1982

CERTIFIED LETTER

U.S. Environmental Protection Agency Sixth and Walnut Streets Philadelphia, Pennsylvania 19106 Attention: Ms. Shirley Bulkin (3EN24)

Dear Ms. Bulkin:

In reply to your letters dated December 30, 31, 1981, we are hereby notifying your office that the new permanent identification numbers for the following facilities of Appalachian Power Company will be used starting on February 1, 1982.

Facility		Old I. D. Number	New I. D. Number
Clinch River Pl St. Rt. 65 Carbo, Virginia		VAT000621169	VAD980554596
Glen Lyn Plant U. S. Rt. 460 Glen Lyn, Va.	24093	VAT000621524	VAD001894542
Philip Sporn P1 U. S. Rt. 33	•	NVT000620617	WVD980554706
New Haven, WV	25265	WVT000620617	MANIEL STRUCK STATE OF THE STAT
John E. Amos P1 U. S. Rt. 35 St. Albans, WV		WVT000621821	WVD980554646
Mountaineer Pla	nt		
U. S. Rt. 33 New Haven, WV	, v	WVT000620096	WVD980554463
Kanawha River P U. S. Rt. 60		1007000001000	UVD000EE4E00
Glasgow, WV 2	5086	WVT000621896	WVD980554588
Point Pleasant Point Pleasant,		WVT000620609	WVD980554521

Ms. Shirley Bulkin January 25, 1982 Page Two

If you have any questions, please contact me at 703-985-2376.

Sincerely,

Richard E. Northup Environmental Affairs Director

By:

Danny L. Gray O Environmental Engineer

REN:DLG:dd



REGION III

6TH AND WALNUT STREETS
PHILADELPHIA. PENNSYLVANIA 19106

December 31, 1981 Certified Mail Return Receipt Requested

Mr. C. A. Heller Ohio Power Company 301 Cleveland Avenue, SW Canton, OH 44702

Re: EPA Identification Numbers

Facility Location: US Route 33

New Haven, WV 25265

Dear Mr. Heller:

Shortly after the filing of a Notification of Hazardous Waste Activity form (EPA-8700-12) with the EPA for the above facility, a temporary identification number WT 00 062 0617 was issued in order to expedite the issuance of I.D. numbers.

A permanent identification number WD 98 055 4703 has now been assigned for your facility. Realizing that you might have a supply of Manifest forms printed with the temporary number and you may have to contact companies with which you deal, you are permitted to use the temporary number for up to six months. You may, however, start using your permanent number immediately.

It is requested that you let this office know, within 30 days of receipt of this letter, the date you intend to implement the use of the new permanent EPA Identification Number by contacting Joan Henry, a member of my staff, on 215-597-8751 or by writing to: EPA, 6th & Walnut Streets, Philadelphia, PA 19106, Attn: Shirley Bulkin (3EN24). With this information we will have an accurate record of your I.D. number and be able to avoid possible confusion.

Sincerely yours,

Shirley D. Bulkin

Chief, RCRA Administrative Support Section

Permit Enforcement Branch

∞: R. Jelacic, WV Dept. of Health



REGION III

6th AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

Certified Mail
Return Receipt Requested
December 31, 1981

Mr. John W. Vaughan Appalachian Power Co.-P. Sporn Plt. P.O. Box 2021 Roanoke, VA 24022

Re: EPA Identification Numbers

Facility Location: US Route 33

New Haven, WV 25265

Dear Mr. Vaughan:

Shortly after the filing of a Notification of Hazardous Waste Activity form (EPA-8700-12) with the EPA for the above facility, a temporary identification number <u>WVT 00 062 0617</u> was issued in order to expedite the issuance of I.D. numbers.

A permanent identification number <u>WD 98 055 4703</u> has now been assigned for your facility. Realizing that you might have a supply of Manifest forms printed with the temporary number and you may have to contact companies with which you deal, you are permitted to use the temporary number for up to six months. You may, however, start using your permanent number immediately.

It is requested that you let this office know, within 30 days of receipt of this letter, the date you intend to implement the use of the new permanent EPA Identification Number by contacting Joan Henry, a member of my staff, on 215-597-8751 or by writing to: EPA, 6th & Walnut Streets, Philadelphia, PA 19106, Attn: Shirley Bulkin (3EN24). With this information we will have an accurate record of your I.D. number and be able to avoid possible confusion.

Sincerely yours,

Shirley D. Bulkin

Chief, RCRA Administrative Support Section

Permit Enforcement Branch

c: R. Jelacic, W Dept. of Health



REGION III

6TH AND WALNUT STREETS PHILADELPHIA PENNSYLVANIA 19106

August 9, 1981

Mr. C. A. Heller Ohio Power Company 301 Cleveland Avenue, SW Canton, OH 44702

Dear Mr. Heller:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Sharley D. Buckers Shirley D. Bulkin

Chief, Administrative Support Section

Permit Enforcement Branch

Enclosure

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Appalachian Power Company-Phil. Sporn Plant

Location: US Rt. 33

New Haven, WV 25265

EPA I.D. No.: WVT 00 062 0617

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. John W. Vaughan, President APCO Mr. C. A. Heller, President OPCO Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

. 1	PROCE	<u>ss</u>		DESIGN CAPACITY
	S01			165 Gals.
	S02			50,000 Gals.
	T02	•		71,500 Gals/Day
-	D83			1,000,000 Gals.
	T04			144,000 Gals/Day
	S04		<u> </u>	1,000,000 Gals.

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Ezzardous Waste Numbers.

F001 D007



REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

August 9, 1981

Mr. John W. Vaughan Appalachian Power Co. - Phil. Sporn Plant P.O. Box 2021 Roanoke, VA 24022

Dear Mr. Vaughan:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin

Chief, Administrative Support Section

Permit Enforcement Branch

Enclosure

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Pacility name, location, and EPA Identification Number.

Name: Appalachian Power Company-Phil. Sporn Plant

Location: US Rt. 33

New Haven, WV 25265

EPA I.D. No.: WVT 00 062 0617

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. John W. Vaughan, President APCO
Mr. C. A. Heller, President OPCO
Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS	DESIGN CAPACITY
S01	165 Gals.
S02	50,000 Gals.
T02	71,500 Gals/Day
D83	1,000,000 Gals.
T04	144,000 Gals/Day
S04	1,000,000 Gals.

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Ezzardous Waste Numbers.

F001 D007

COMMUNICATION	OTHER (SPEC	IFY)	•	
	·	(Record of item	checked above)	
RE NorthRup (703) 985-2429 Philip Sporw Plant	FROM: Mike	ORSINI.	DATE Jun	4 15,1981
Correction of unit of measi	ne for TO.	2		
7/15- MR. Northup will be	on vacenti	on until	July 20	
7/20/81			000 MIN	
10:29am. ma. Worthop br Me. Grey. stated that	this breat	me to co	مد میں	ad only
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pour day be durid	ul He ib	ى _ فىل	1500,000	gallono
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REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # WVT 00 062 0617

January 14, 1981

Philip Sporn Plant Appalachian Power Company P.O. Box 2021 Roanoke, Virginia 24022

Re: Acknowledgment of Application for a Hazardous Waste Permit

.This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part: 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

Post Office Box 2021, Roanoke, Virginia 24022 Telephone: area code 703 • 344-1411

November 17, 1980

CERTIFIED LETTER

Ms. Shirley Bulkin
U. S. Environmental Protection Agency
Region III
P. O. Box 1480
Philadelphia, Pennsylvania 19106

Re: Hazardous Waste Permit Applications

Dear Ms. Bulkin:

Attached is Part A (Form 1 and Form 3) of the applications for permits to treat, store, or dispose of hazardous wastes at seven Appalachian Power Company facilities. They are:

John E. Amos Plant		I.	D.	No.	WVT000621821
Philip Sporn Plant		I.	D.	No.	WVT000620617
Mountaineer Plant		I.	D.	No.	WVT000620096
Kanawha River Plant					WVT000621896
Glen Lyn Plant					VAT000621524
Clinch River Plant		I.	\mathbf{D}_{\bullet}	No.	VAT000621169
Point Pleasant Storage	Area	I.	D.	No.	WVT000620609

These applications are filed pursuant to the regulations promulgated by the Environmental Protection Agency and published in the May 19, 1980 Federal Register.

Sincerely,

Richard E. Northup

Environmental Affairs

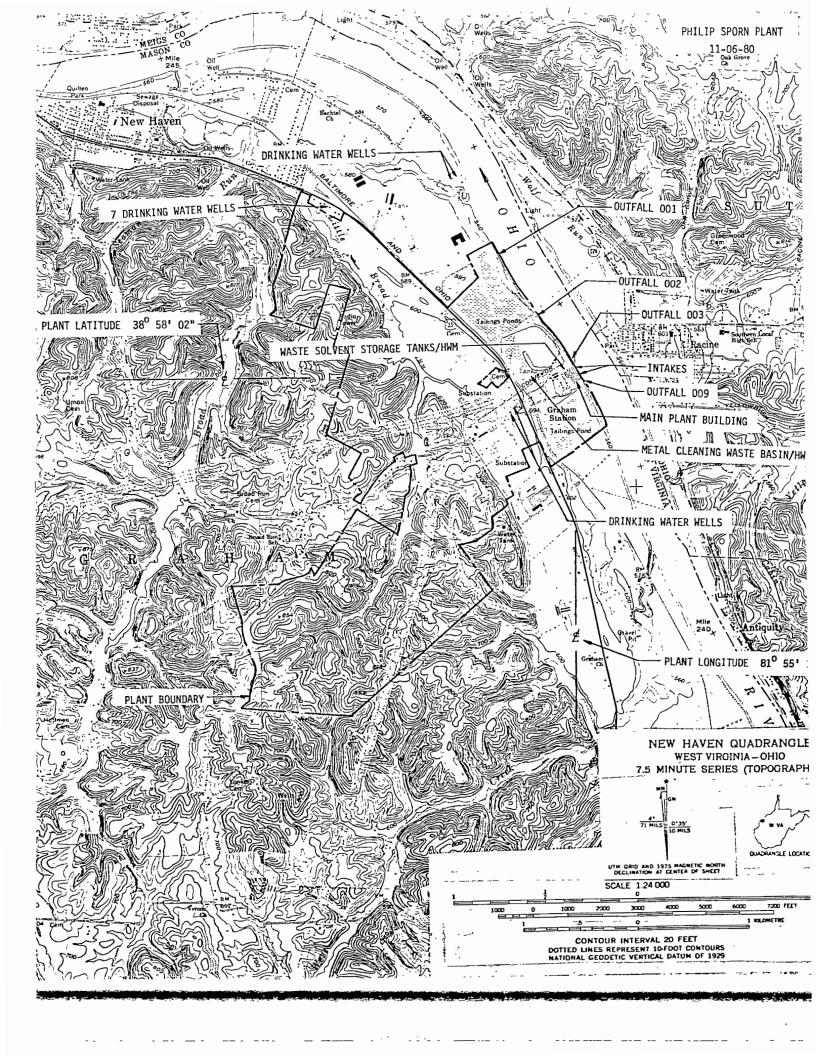
Director

REN:dd

Attachments

I TONIM I O EDA	GENERALINFORMATION	I. EPA I.D. NUMBER
	Consolidated Pennits Rrogram	FWVT000620617
GENERAL LABELITEMS	(Read the "General Instructions" before starti	GENERAL INSTRUCTIONS
I. EPA I.D. NUMBER	Namiona	If a preprinted label has been provided
OTVW	00620617	it in the designated space. Review the in ation carefully; if any of it is incorrect
MIL FACILITY NAME		through it and enter the correct data appropriate fill—in area below. Also, if
FACILITY	lachian Power Company ip Sporn Plant	the preprinted data is absent (the area left of the label space lists the inform
	Box 2021	that should appear), please provide it.
Roam	oke, Virginia 24022	proper fill—in area(s) below. If the k
Atte	ition: R. E. Northup	Items I, III, V, and VI (except VI-B must be completed regardless). Compl
VI FACILITY New	laven, West Virginia	items if no label has been provided. Retthe instructions for detailed item of
	2000 St. 1000 St. 2000 St. 200	and for the legal authorizations
		this data is collected.
II. POLLUTANT CHARACTERISTICS		
questions, you must submit this form and	o determine whether you need to submit any	the EPA. If you answer "yes" to Mark "X" in the box in the third columns for definitions of hold-freed terms
if the supplemental form is attached. If yo	u answer "no" to each question	Sooth use forms. You may answer "no" if your active
is excluded from permit requirements; see S	ection C of the instructions	2 · ructions for definitions of bold-faced terms.
SPECIFIC QUESTIONS	the supplemental form listed in the particular answer "no" to each question, continued to the instructions of the instructions of the include aquatic discharge in discharge D. Is this a	SPECIFIC QUESTIONS MARK
A. Is this facility a publicly owned tree	tment v 98 mian Does or	will this facility (either existing or proposed)
which results in a discharge to waters (FORM 2A)	of the Include equatic	a concentrated animal feeding operation or animal production facility which results in a
C. Is this a facility which currently results	in discharge	e to waters of the U.S.? (FORM 2B) proposed facility (other than those described
to waters of the U.S. other than those	in A or	B above) which will result in a discharge to X
A or B above? (FORM 2C)	F. Do you	or will you inject at this facility industrial or
E. Does or will this facility treat, store, hazardous wastes? (FORM 3)	or dispose of X X municipal	al effluent below the lowermost stratum con- within one quarter mile of the well bore,
	28 29 30 undergro	ound sources of drinking water? (FORM 4)
G. Do you or will you inject at this facility water or other fluids which are brought	to the currence H. Do you	or will you inject at this facility fluids for spe-
in connection with conventional oil or n duction, inject fluids used for enhance	atural gas pro-	cesses such as mining of sulfur by the Frasch X solution mining of minerals, in situ combus-
oil or natural gas, or inject fluids for sto	prage of liquid (FORM	fossil fuel, or recovery of geothermal energy?
hydrocarbons? (FORM 4) I. Is this facility a proposed stationary so	ource which is J. Is this f	facility a proposed stationary source which is
one of the 28 industrial categories lis structions and which will potentially e		ne of the 28 industrial categories listed in the lons and which will potentially emit 250 tons
per year of any air pollutant regulat Clean Air Act and may affect or be	ed under the ^ per year	r of any air pollutant regulated under the Clean and may affect or be located in an attainment
attainment area? (FORM 5)	40 41 42 area? (F	
III. NAME OF FACILITY		
1 SKIP PHILIP SPOR	N PLANTA / S	PORN Plant
IV. FACILITY CONTACT	the state of the s	
A. NAME &	TITLE (last, first, & title)	B. PHONE (area code & no.)
NORTHUP R E E	NVIRON. AFF. D	I R. 7.0.3 9.8.5 2.4.2.9
15 75		45 46 - 48 A9 - 51 52 - 55
V. FACILITY MAILING ADDRESS	EET OR P.O. BOX	
		* 1 '1 '
3 P 0 B 0 X 2 0 2 1		45
B. CITY OR	TOWN C.STA	ATE D. ZIP CODE
4 R O A N O K E		4 2.4.0.2.2
VI. FACILITY LOCATION	40 41 4	42 47 51
	OR OTHER SPECIFIC IDENTIFIER	
		*This Form 1 is submitted to
15 16		obtain a RCRA Permit. The facility already has a NPDE:
B. COUNTY!	''	Permit.
MASON		,
C. CITY OR	TOWN D.STA	ATE E. ZIP CODE F. COUNTY CODE
6 NEW HAVEN	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ATE E. ZIP CODE (If known)
15 10	W V	1 2 5 2 6 5 3 32 54
EPA Form 3510-1 (6-80)		CONTINUE ON RE

VII. SIC CODES 14-digit, in order of priority)			Market San Committee	
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7 4,9 1,1 SERV	ICES -	7 N.A.		
CATHIRD			D. FOURTH	
7 NA (specify)		7 N.A.	cify)	***
VIII. OPERATOR INFORMATION	,	15 16 - 15	,	
VIII. OF ERATOR INFORMATION	A. NAME			B. Is the name listed
				item VIII-A also t owner?
which are in a sent to an in the sent to be a first to the sent to	I.N.GC.O.M.P.	1.N.Y.	or all or the second	ŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢŢ
15 16 C. STATUS OF OPERATOR (Enter the ap			AND THE RESERVE	one (area code & no.)
F = FEDERAL M = PUBLIC (other than		specify)	· · · · · · · · · · · · · · · · · · · ·	
S = STATE O = OTHER (specify) P = PRIVATE	P 96	,	A 7.0.3	9.8.5 2.3.0.0
E. STREET	OR P.O. BOX			
P 0 B 0 X 2 0 2 1				
F. CITY OR TO	WN	G.STATE H.	ZIP CODE IX, INDIAN LA	ND>
CTTTTTTTTTT			The state of the s	ocated on Indian lands?
BROANOKE,	L -L	V A 2.4	1.0`.2.2 📑 🖵 YES	. □XI NO
(5) 16		40 41 42 47	tal and the state of the state	
X. EXISTING ENVIRONMENTAL PERMITS A. NPDES (Discharges to Surface Water)	D PSD (Air Emission	s from Proposed Source		
CTITITITI	C T L I I I I		" T	
9 N W. V.O.O.O.1.0.5.8	9 P N.A.		30	
B. U.C (Underground Injection of Fluids)	E. OTHE	R (specify)		
9 U N A	9 I W5 9	8.37.8	(specify) WEST V	IRGINIA DNR
C. RCRA (Hazardous Wastes)	30 15 16 17 18 E. OTHI	R (specify)	₩ASTEWATER	
9 R	9 5 5 9 2		(specify) WEST V	IRGINIA DEPT. OF
35 (16 (17 (18) XI. MAP	30 15 16 17 182		HEALTH SEWAG	
Attach to this application a topographic method the outline of the facility, the location of treatment, storage, or disposal facilities, as water bodies in the map area. See instruction XII. NATURE OF BUSINESS (provide a brief description)	each of its existing and properties of its each well where it injures for precise requirements.	proposed intake and ects fluids undergrou	discharge structures, each	h of its hazardous waste
	the some was a set of	2 · · · · · · · · · · · · · · · · · · ·	and the second of the second of the second	Note that the second second
ELECTRIC GENERATING FACI	LITY - TWO 150 MW	COAL-FIRED UN	ITS OWNED BY	
APPALACHIAN POWER COMPAN	Y, TWO 150 MW COA	L-FIRED UNITS	AND ONE 450 MW	•
COAL-FIRED UNIT OWNED BY	OHIO POWER COMPA	NY. ALL FIVE	UNITS HAVE	
ELECTROSTATIC PRECIPITAT	UKS AND UNCE-THRU	UGH COOLING WA	TER SYSTEMS.	
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XIII. CERTIFICATION (see instructions)				
I certify under penalty of law that I have attachments and that, based on my inquipapplication, I believe that the information false information, including the possibility	iry of those persons imn is true, accurate and cor	nediately responsible nplete. I am aware ti	for obtaining the inform	nation contained in the
A. NAME & OFFICIAL TITLE (type or print)	MAN B. SIGNAT	'URE /// 4/	n men ng comme tra manganahakan mengan nga trapit (Anderson Anderson Ander	C. DATE SIGNED
John W. Vaughan, Vice Presider Central Operating Compa		n W. Vau	chan	11/13/80
COMMENTS FOR OFFICIAL USE ONLY	ly /o W			
C 15 16				- 55
PA Form 3510-1 (6-80) REVERSE		2000	The second secon	The result of the second of th



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revis EPA	ed a	ppli Nu	icat umb	the appropriate box ion. If this is your fi er in Item I above,	rst appl	ication and ye	ou airea	dy k	now y	our	facility									
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NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described to more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annu quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line ent "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 poun per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two waster corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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	TO4 - METAL ITEM III.	CLEANING	WASIES	AKE BUKNEÎ	J IN PLANI	ROILERS	. SEE	ATTACHME	.N I •	
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EPA I.D.	NO. (enter from page	T/AC								
W V D 9 8	3 0 5 5 4 17 10	0 3 6								
, FACILITY										
I. PHOTOGR	ties must include in	the space provid	ed on page 5	a scale drawing	of the facility (s	ee instructions	tor more d	etail).		
	cilities must includ	ie photograph:	s (aerial or	ground—level)	that clearly d	elineate all ex	cisting stru	ctures; exis	ting storage,	
	disposal areas; and		re storage, t	reatment or di	sposal areas (s	ee instructio	ns for mor	e detail).	à Carlleto es la tot escapa à é	orab Fillatos
II. FACILITY	GEOGRAPHIC				and the same		dograda	ninutes, & sec	aonda)	
	LATITUDE (degre	es, minutes, & se	econas)			LONGITUDI	E. (degrees, r	minutes, & sec	Conds)	
	3 8	5 8 0	2			72 -	$\begin{bmatrix} 8 & 1 & 5 \\ 74 & 75 \end{bmatrix}$	$\frac{5}{76}$ $\frac{1}{77}$ $\frac{7}{79}$	4	
III. FACILIT	Y OWNER		1.67							
A. If the factorial	cility owner is also the	he facility operat	tor as listed i	n Section VIII o	n Form 1,"Gen	eral Informatio	on", place a	n "X" in the l	box to the left	and
skip to S	Section IX below.					and a second		n "X" in the l	box to the left	and
skip to S	cility owner is also the cition IX below.	ne facility operat	or as listed in	n Section VIII o	Form 1, comp	and a second				
skip to S	ection IX below.	ne facility operat	or as listed in		Form 1, comp	and a second			: NO. (area coo	
skip to S	cility owner is not the	ne facility operat	or as listed in	n Section VIII o	Form 1, comp	and a second	ving items:	2. PHONE	NO. (area cod 9 8 5 2 4 5 6 7 8	de & no
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PAGE 3 OF 5 (enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

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I certify under	penalty of law that I have person	onally examined and	d am familiar with ti	he information	submitted in this and al	attached
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HAZ (DOUS WASTE PERMIT APPLICATION Consolidated Permits Program

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C. SPACE FOR ADDITIONAL PROCESS CO	DES OR FC., DESCRIBING OT	HER PROCESSES (code "T04"). 1	JR EACH PROCESS ENTERED HERE
INCLUDE DESIGN CAPACITY.		, , , , , , , , , , , , , , , , , , , ,	
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TO4 - METAL CLEANING WASTES ARE BURNED IN THE PLANT BOILERS. SEE ATTACHMENT, ITEM III.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If yo handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteris tics and/or the toxic contaminants of those hazardous wastes."
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annua basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	Α.	EP/				UN													D. PROCESSES
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Form 3510-3 (6-80)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D	(1) ON PAGE 3.
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EPA I.D. NO. (enter from page 1)	
WVD-98-055-47036	
V. FACILITY DRAWING	
All existing facilities must include in the space provided on page 5 a scale drawing of the facil	ity (see instructions for more detail).
VI. PHOTOGRAPHS	
All existing facilities must include photographs (aerial or ground—level) that clear treatment and disposal areas; and sites of future storage, treatment or disposal areas.	
VII. FACILITY GEOGRAPHIC LOCATION	as face matridetions for more detail,
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VIII. FACILITY OWNER	72 - 74 75 76 77 - 79
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VIII. FACILITY OWNER A. If the facility owner is also the facility operator as listed in Section VIII on Form 1,	'General Information", place an "X" in the box to the left and
VIII. FACILITY OWNER A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, skip to Section IX below.	'General Information", place an "X" in the box to the left and omplete the following items:
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VIII. FACILITY OWNER A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, skip to Section IX below. B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, on the facility	General Information", place an "X" in the box to the left and omplete the following items: 2. PHONE NO. (area code & no., 7 0 3 9 8 5 2 3 0
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VIII. FACILITY OWNER A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, skip to Section IX below. B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, on the facility	General Information", place an "X" in the box to the left and omplete the following items: 2. PHONE NO. (area code & no., 7 0 3 9 8 5 2 3 0 2 1 6 4 5 6 8 1 7
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